

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND

ORIGINAL

3 BRUCE ALLEN LILLER, et al.,

4 Plaintiffs

5 vs. Case No.:

6 ROBERT KAUFFMAN, et al., MJG 02-CV-3390

7 Defendants

8 /

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10 The deposition of DR. RAYMOND DRAPKIN was

11 held on Friday, December 19, 2003, commencing at 12:38

12 p.m., at the offices of Dr. Raymond Drapkin, 545 Main

13 Street, Laurel, Maryland, before Oneeka S. Hill, a

14 Notary Public.

15

16 APPEARANCES:

17 ARNOLD PHILLIPS, ESQUIRE (telephonically)
18 On behalf of the Plaintiffs

19 JENNIFER S. LUBINSKI, ESQUIRE
20 On behalf of the Defendants

21 REPORTED BY: Oneeka S. Hill

EXHIBIT

3

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1 STIPULATIONS

2 It is stipulated and agreed by and between
3 counsel for the respective parties that the reading
4 and signing of this deposition by the witness be and
5 the same are hereby waived.

6 It is further stipulated and agreed that
7 the filing of this deposition with the Clerk of Court
8 be and same is hereby waived.

9 - - - - -
10 (Deposition Exhibit Numbers 1 and 2 were
11 marked for purposes of identification.)

12 EXAMINATION BY MS. LUBINSKI:

13 Q Good morning or good afternoon, Dr.
14 Drapkin.

15 A How are you?

16 Q I am good. We are here today to talk
17 about Bruce Liller. Now, there are two plaintiffs in
18 this case, Bruce and Michael Liller. It's my
19 understanding you hold opinions only with respect to
20 Bruce Liller, is that correct?

21 A Yes.

1 A This?

2 Q Yes.

3 A I basically charge \$425 for the IME, and
4 then depending on how much time it takes me to review
5 the medicals, whatever extra, if I take any x-rays,
6 whatever x-rays I have to take.

7 Q Do you charge an hourly rate for the
8 additional time you spend reviewing the medical
9 records?

10 A I basically just ballpark it depending how
11 long it is and how difficult it is to understand.

12 Q How much have you charged so far for the
13 work you performed for Bruce Liller?

14 A I don't have a clue.

15 Q I think you have a bill?

16 A I have to look it up. I don't have a
17 clue. Did you see it in here?

18 Q I thought I did. Let me take a look.

19 A Usually they put it on this side.

20 Q While he is looking let's go ahead and
21 mark -- you know what, I've got it, sorry.

10

1 A I charged -- you want me to go over each
2 one?

3 Q Yes, please?

4 A \$425 for the IME, \$160 for the x-ray of
5 the lumbar spine, 120 for stress x-rays of the lumbar
6 spine, \$175 for review of medical records.

7 Q What are stress x-rays?

8 A That's when you have the patient bend in
9 different directions.

10 Q Are all of the opinions that you hold with
11 respect to Mr. Liller contained within your report?

12 A Yes, they are.

13 Q What did you review in connection with the
14 preparation of your opinions?

15 A All the medical records that were sent to
16 me.

17 Q Those were the medical records that are
18 contained there in your file?

19 A Yes.

20 Q I think you have on the table here the
21 films?

16

1 had a laceration to his spleen.

2 Q Do you have any opinions, well, do you
3 hold any opinions with respect to the, to Mr. Liller's
4 spleen and to the extent that may necessitate any
5 future treatment?

6 A You really have to ask a general surgeon.
7 I mean I do general surgery but I haven't looked at
8 the spleen in years. All I know it wasn't bad enough
9 that it required surgery. It's been going on two
10 years since the injury, so I don't know that he is
11 necessarily going to have any problems with his
12 spleen, whether or not it's compromised, I couldn't
13 tell you.

14 Q Do you have any opinions with respect to
15 the reasonableness and necessity of Mr. Liller's
16 treatment thus far and the medical bills associated
17 with it?

18 A None.

19 Q Do you know whether you are going to be
20 called to testify in this case or via video?

21 A I have no idea.